

# Diesel AST In-Place Closure Report

Atlantic Relocation Systems Fishers, Indiana

April 2016

ERM Project No. 0292130



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#### 1.0 INTRODUCTION AND BACKGROUND

In April 2016, Environmental Resources Management, Inc. (ERM) conducted in-place closure activities for an on-site, diesel aboveground storage tank (AST) located at the Atlantic Relocation Systems (Atlantic) facility located at 9967 Westpoint Drive in Fishers, Indiana (the Site). ERM understands that diesel fuel had reportedly been released during third-party fueling of the 8,000-gallon, diesel AST referenced above, and migrated into the storm water sewer. A Site location map is included as Figure 1.

#### 1.1 PROJECT OBJECTIVE

The objectives of the in-place closure activities were to:

- remove the residual diesel fuel from the AST, associated lines, and the dispensing unit,
- rinse the tank and associated lines to remove diesel residuals, and
- cap (i.e. blank) the filling and dispensing ports on the tank, and remove associated piping.

The result of these activities was intended to close the above referenced AST in-place, per the definition contained in 40 C.F.R. § 112.2, thereby eliminating the potential risk petroleum-related on-site spills from activities associated with the AST.

#### 1.2 LIMITATIONS AND EXCEPTIONS

This report is based up on the application of scientific principles and professional judgment to certain facts with resultant subjective interpretations. Professional judgments expressed herein are based on the facts currently available within the limits of the existing data, scope of work, budget, and schedule.

The services provided by ERM during this project have been rendered in a manner consistent with the level of skill and care ordinarily exercised by members of the profession currently practicing under similar conditions. It is ERM's intent that the conclusions and recommendations stated herein are intended as guidance and not necessarily a firm course of action except where explicitly stated as such. The findings and conclusions presented herein apply to the environmental conditions existing at the time ERM's services were conducted.

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## 1.3 HEALTH AND SAFETY PLAN

During investigation activities, ERM personnel performed work in accordance with a project health and safety plan developed for the Site, dated April 4, 2016.

#### 2.0 AST CLOSURE ACTIVITIES

The AST closure activities were mainly comprised of three (3) tasks, which were as follows:

- remove the residual diesel fuel from the AST, associated lines, and the dispensing unit,
- rinse the tank and associated lines to remove diesel residuals, and
- cap (i.e. blank) the filling and dispensing ports on the tank, and remove associated piping.

The above referenced activities were completed on 05 April 2016 at the Site. The activities for each task are described in the following discussion.

Mr. Don Flowers of ERM provided contractor oversight and conducted inplace closure confirmation activities. Tank closure activities and waste transportation were conducted by Environmental Restoration (ER) in Indianapolis, Indiana. Wastes were transported to, and treated by CGS Services in Morristown, Indiana.

#### 2.1 REMOVAL OF RESIDUAL DIESEL FUEL

Prior to initiating closure activities, ERM implemented spill containment measures, which included placement of absorbent pads and socks in the work area and installation of spill mats over nearby stormwater catch basin drains.

The dispensing unit associated with the diesel AST was turned on, and remaining fuel was pumped through the dispensing unit, and collected in a vacuum truck. After pumping as much fuel as possible via the dispenser, the dispenser was turned off, and electrically tagged out. After tagging out power to the dispensing unit, the dispenser components were dismantled and the fuel was evacuated using the vacuum truck unit. A total of approximately 40 gallons of fuel were removed from the AST.

#### 2.2 RINSING ACTIVITIES

After removing residual diesel fuel from the AST, the atmosphere was monitored though the top portal of the AST. Once atmosphere readings were complete and acceptable to start work, potable water was used to pressure rinse the interior of the AST and associated lines. The interior rinsing activities were accessed through the top portal of the AST.

Approximately 235 gallons of rinse water were used to rinse the AST. Rinsing activities were completed to a visual standard. Photo documentation of the rinsed interior of the AST is included in Appendix A.

#### 2.3 CAPPING AND PIPING REMOVAL

After rinsing the interior of the AST and associated lines, the piping associated with the input/fill line and the dispensing line was removed and the ports for these lines were capped (i.e. blanked off) at the AST. Both of these lines were top-mounted before their removal. An AST vent line was left in place to account for pressure variations in the vessel. Hard piping associated with the dispensing and fill lines were rinsed, wiped down, and placed inside the AST secondary containment structure. Notice of closure of the AST, along with the date of closure, was noted on the AST.

#### 2.4 DISPOSAL OF FUEL AND RINSATE

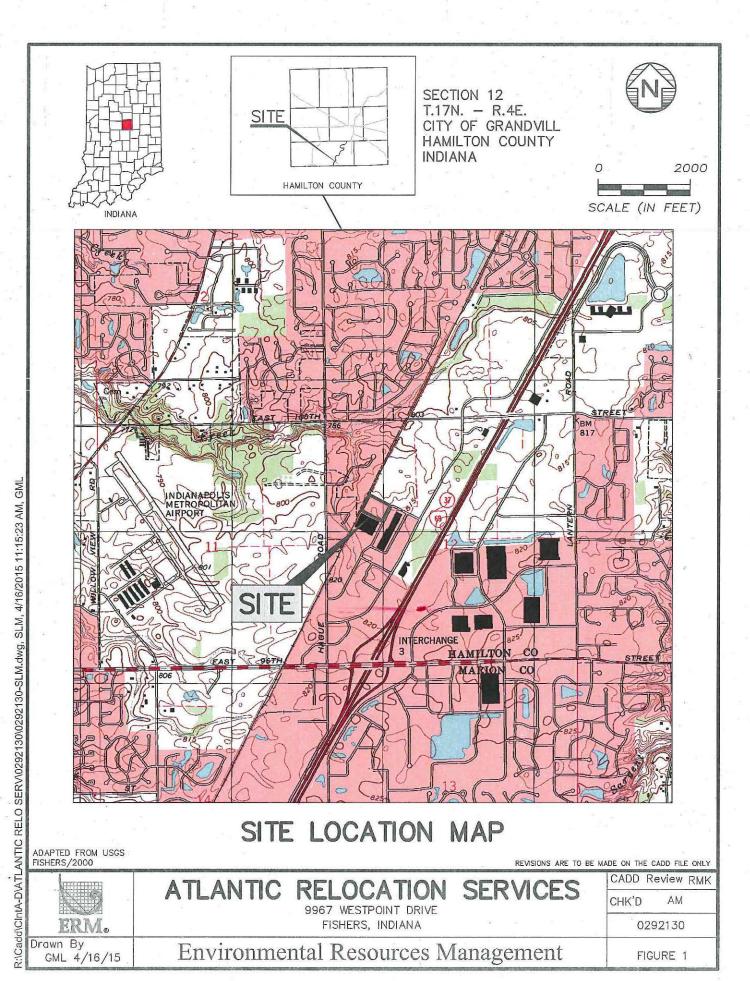
Fuels and rinsate generated by Site activities were contained in a vacuum truck unit, and transported by Environmental Restoration to CGS Services in Morristown, Indiana for treatment. Copies of waste profile and disposal documentation are included in Appendix B.

#### 4.0 CONCLUSIONS

ERM completed in-place closure activities of an 8,000 gallon, diesel fuel AST at the Atlantic facility in Fishers, Indiana on 05 April 2016. As part of these activities, remaining diesel fuel was removed from the AST, associated piping, and the dispensing unit. After removal of diesel fuel, the AST and associated piping was pressure rinsed with potable water. Fuels and rinsate were collected in a vacuum truck, and treated at CGS Services in Morristown, Indiana. The rinsed hard-piping associated with the dispensing and input/fill lines was removed and placed in the AST secondary containment, and the ports for these lines on the top of the AST were properly capped.

Based upon the activities described above, ERM considers the AST to be permanently closed in-place, per the definition contained in 40 C.F.R. § 112.2. If the tank is to be put back into service, ERM suggests that the AST and related components be professionally inspected, and also that the facility have a site-specific Spill Prevention, Control, and Countermeasure (SPCC) Plan developed and implemented prior to use.

# Figures



Appendix A

Photographic Log



Photo No. 1 Use of vacuum truck to remove fuels and rinsate.



Photo No. 2 Use of vacuum truck to remove fuels and rinsate (dispensing lines).



Photo No. 3 Use of vacuum truck to remove fuels and rinsate (fill port).



Photo No. 4 Interior of AST after rinsing with potable water.



Photo No. 5 AST after removal and capping of dispensing line.

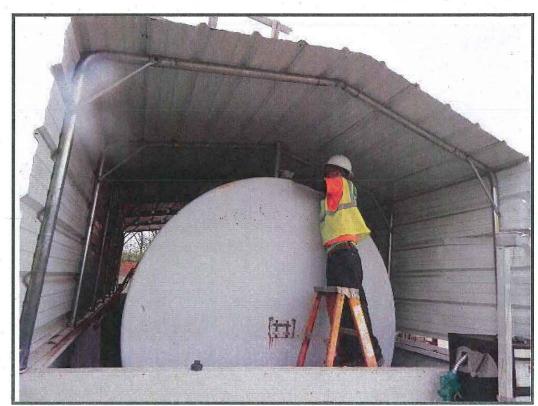


Photo No.6 Capping dispensing line port.

# Appendix B

Waste Profile and Disposal Documentation 3110



CGS Services, Inc. PO Box 212 2920 E US 52 Morristown, IN 46161 765.763.6258 or 800.453.5575 Fax: 765.763.6174

#### NON-HAZARDOUS WASTE VERIFICATION NOTICE

Note: MSDS Documentation must be provided before approval will be granted.

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Generator Name:	Atlantic Relocation Systems	Mailing Address:	9987 Westpoint Drive	County:	70	
Contact Name:	Jay Strong	City:	Indianapolis	State:	IN	
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	ultant or Third Party Information		N. C.	3000 UEL 3750		
Company Name: Contact Name:	Indiana Splil Response LLC Keith Belcher	Mailing Address: City:	708 W 1st Street Rushville	County: State:	70 UJ	-
Contact Phone:	(317)498-6616	Saly.	* 10-01141109	Zip:	46173	
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# **NON-HAZARDOUS WASTE MANIFEST**

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